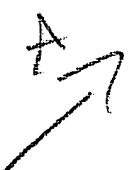## REMARKS

Claims 1-39 have been examined and are rejected. Applicant traverses the rejections of claims 1-39 as follows.

Claims 1, 2, 4, 13, 14, 16, 25, 26, 28 and 37-39 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by the Challenger et al. publication *Distributed Cache Manager and API* (hereinafter "Challenger").

The Examiner alleges that Challenger teaches a "[cached] web page [that] references other objects", as recited in claim 1 (*see also* claims 13 and 25), by describing an HTML page constructed from other data aggregates (*citing* ¶ 3 of Challenger's *Overview* section). Applicant respectfully disagrees.

Claim 1 (*see also* claims 13 and 25) requires caching a web page that references other objects. By way of example and not by way of limitation, a web page can contain hypertext links that reference objects stored in data stores (*e.g.*, a local file system) that can be accessed by a web server that serves the web page. These hypertext links permit the referenced objects to be made available to a user at a web browser as an integral part of the web page that contains the links. Thus, the web page will appear incomplete if it is served to a user and the objects referenced through these hyperlinks cannot be provided.

Conversely, Challenger discloses that a cached web page may have been constructed (*i.e.*, generated) from several other data aggregates such as database tables (*see* ¶ 3 of Challenger's *Overview* section). The construction of such a web page that includes data from one or more data aggregates, and which is subsequently cached, as disclosed in Challenger, is not a cached

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web page that references other objects, as recited in claim 1 (*see also* claims 13 and 25), but rather includes the objects as part of the cached web page. Accordingly, Challenger does not disclose or suggest that a created web page references the database tables from which it was created.

Claim 1 also requires "automatically managing the cached web page and the referenced objects to ensure the display of a complete web page" (*see also* claims 13 and 25). The Examiner asserts that Challenger discloses such a limitation by disclosing that if a database table is updated, all cached objects (*e.g.*, web pages) depending on the table (*i.e.*, those pages which were constructed from the table) become invalidated (*citing* ¶ 3 of Challenger's *Overview* section). However, since Challenger fails to disclose or suggest a cached web page that references other objects, as required by the claims, it follows that Challenger does not disclose and cannot possibly suggest "automatically managing the cached web page and the referenced objects to ensure the display of a complete web page," as recited in claim 1 (*see also* claims 13 and 25), since Challenger does not automatically manage any such referenced objects.

Instead, as noted above, Challenger describes a cached web page constructed (*i.e.*, generated) from several other data aggregates such as database tables (*see* ¶ 3 of Challenger's *Overview* section). In this manner, the pages in the cache are said to be dependent on the database tables from which they are created (*see* ¶ 2 of Challenger's *Cache Coherency* section). For example, cached pages (Page1, Page2 and Page3) may have been constructed from a database table (Table2) such that the cached pages include data from Table2 and hence, are "dependent" on the database table (*see* ¶ 6 and the corresponding diagram of Challenger's *Cache*

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Coherency section). If Table2 is updated (*e.g.*, a value in Table2 that affects the contents of

Page1, Page2 and Page3 is changed), Page1, Page 2 and Page 3 can be purged since they depend

on values held in Table2 (*see* ¶¶ 5-6 of Challenger's *Cache Coherency* section). However,

Table2 is not purged.

Thus, the cache manager of Challenger manages (*i.e.*, invalidates) only the cached items,

e.g., the pages. For example, the cache manager would invalidate a cached web page listing the

cost of a widget, if the database table (storing the widget's current price) from which the web

page was created is updated after caching the web page. However, the cache manager of

Challenger does not manage the database tables themselves. In this manner, the cache manager

of Challenger ensures coherency between the cached items and the database tables from which

they were constructed (*see* Challenger's *Cache Coherency* section).

For at least the above exemplary reasons, claims 1, 13 and 25 are not anticipated by

Challenger. Consequently, claims 2, 4, 14, 16, 26, 28 and 37-39 are not anticipated by

Challenger, at least by virtue of their dependency.

The exemplary deficiencies of Challenger, as set forth above, are not cured by, either

alone or in combination, Mattis et al., U.S. Patent No. 6,209,903 (hereinafter "Mattis"); Burns et

al., U.S. Patent No. 5,991,306 (hereinafter "Burns"); Schultz et al., U.S. Patent No. 6,453,339

(hereinafter "Schultz"); Acharya et al., U.S. Patent No. 6,408,296 (hereinafter "Acharya"); and

Scarr et al., U.S. Patent No. 5,659,547 (hereinafter "Scarr"). Consequently, claims 3, 5-12, 15,

17-24, 27 and 29-36 are patentable over a reasonable combination, if any, of the applied

references, at least by virtue of their dependency.

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RESPONSE UNDER 37 C.F.R. § 1.111
U.S. Application No. 09/602,412
Attorney Docket No. A8492 / ST9-99-080

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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Date: January 29, 2004

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